

# EXHIBIT A

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF OHIO  
EASTERN DIVISION

Jane Doe,  
Plaintiff(s)

vs.  
Roy Chanon  
Amy Chanon  
Defendant(s)

Case No. 2:13-cv-00486  
District Judge Frost  
Magistrate Judge Abel

**RULE 26(f) REPORT OF PARTIES**  
(to be filed no fewer than seven (7)  
days prior to the Rule 16 Conference)

1. Pursuant to F.R.Civ.P. 26(f), a meeting was held on \_\_\_\_\_ and was attended by:

Due to sanctions, we are unable to meet with plaintiff(s) attorneys. We are not able to afford an attorney and will be defending ourselves. (pro se)

\_\_\_\_\_, counsel for defendant(s) \_\_\_\_\_

\_\_\_\_\_, counsel for defendant(s) \_\_\_\_\_

2. **Consent to Magistrate Judge.** The parties:

☐ unanimously consent to the jurisdiction of the United States Magistrate Judge  
We give consent to the jurisdiction of the United States Magistrate Judge pursuant to 28 U.S.C. 636 (c).

Judge pursuant to 28 U.S.C. §636(c).

3. **Initial Disclosures.** The parties:

☐ have exchanged the initial disclosures required by Rule 26(a)(1);

☐ will exchange such disclosures by \_\_\_\_\_

☐ are exempt from such disclosures under Rule 26(a)(1)(E).

☐ have agreed not to make initial disclosures.

**4. Jurisdiction and Venue**

- a. Describe any contested issues relating to: (1) subject matter jurisdiction, (2) personal jurisdiction and/or (3) venue:

**Jurisdiction and Venue**

- a. We are residents of the state of New Jersey and believe there is a lack of personal jurisdiction in the State of Ohio. We contend we did not have any association or have any involvement with the website whatsoever or Jane Doe.

- b. Describe the discovery, if any, that will be necessary to the resolution of issues relating to jurisdiction and venue:

- c. Recommended date for filing motions addressing jurisdiction and/or venue:

The Chansons will abide by decisions of the court for the dates to be determined by the Judge.

**5. Amendments to Pleadings and/or Joinder of Parties**

- a. Recommended date for filing motion/stipulation to amend the pleadings or to add additional parties: The Chansons will agree to dates to be determined by the Judge.
- b. (if class action) Recommended date for filing motion to certify the class:

**6. Recommended Discovery Plan**

- a. Describe the **subjects** on which discovery is to be sought and the nature and extent of discovery that each party will need:

We request that the plaintiff(s) attorney produce exhibits of Roy and Amy Chansons participation with the website.

We request plaintiff(s) provide any additional exhibits that Ronald Green can produce as to the alleged telephone calls he says he had with Roy and Amy Chanson in addition to the telephone bills he has produced showing a phone number not belonging to the defendants.

We request Mark Randazza produce exhibits as to his allegations that Roy and Amy Chanson had association with the website.

We request the opportunity to question the plaintiff Jane Doe about the alleged allegations that Amy and Roy Chanson participated in the website and why they deserve to be included in this lawsuit.

b. What **changes** should be made, if any, in the limitations on discovery imposed by the Federal Rules of Civil Procedure or the local rules of this Court?

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c. The case presents the following issues relating to disclosure or discovery of **electronically stored information**, including the form or forms in which it should be produced:

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d. The case presents the following issues relating to claims of **privilege or of protection as trial preparation materials**:

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Have the parties agreed on a procedure to assert such claims **AFTER** production?

☐

No

☐

Yes

☐

Yes, and the parties ask that the Court include their agreement in an order.

e. Identify the discovery, if any, that can be **deferred** pending settlement discussions and/or resolution of potentially dispositive motions:

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f. The parties recommend that discovery should proceed in **phases**, as follows:

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g. Describe the areas in which **expert testimony** is expected and indicate whether each expert will be specially retained within the meaning of F.R.Civ.P.26(a)(2):

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i. Recommended date for making **primary expert designations**:

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ii. Recommended date for making **rebuttal expert designations**:

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h. Recommended **discovery completion date**:

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**7. Dispositive Motion(s)**

a. **Recommended date for filing dispositive motions:**

The Chansons will agree to dates for dispositive motions set by the court.

**8. Settlement Discussions**

a. Has a settlement demand been made? \_\_\_\_\_ A response? \_\_\_\_\_

b. Date by which a settlement demand can be made: \_\_\_\_\_

c. Date by which a response can be made: \_\_\_\_\_

8. Settlement Discussions. At this time, no settlement demands have been made.

**9. Settlement Week Referral**

The Chansons will agree to dates for settlement week as determined by the Judge.  
The earliest Settlement Week referral reasonably likely to be productive is the

\_\_\_\_ March 200\_\_\_\_ Settlement Week

\_\_\_\_ June 200\_\_\_\_ Settlement Week

\_\_\_\_ September 200\_\_\_\_ Settlement Week

\_\_\_\_ December 200\_\_\_\_ Settlement Week

**10. Other matters for the attention of the Court:**

It is our factual and legal contention that we had no association with the website-  
whatsoever.

Signatures:

Roy Chanson  
Roy Chanson (pro se)

Amy Chanson  
Amy Chanson (pro se)

Date: Oct. 4, 2013



**Certificate of Service**

Pursuant to the Federal Rules of Civil Procedure 5(b), I hereby certify that the foregoing document was served upon all other parties via U.S. Mail:

/s/ H. Louis Sirkin

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Dated Oct. 4, 2013

Amy Chan

Pro se  
Amy Chan

Roy Chan

Pro se  
Roy Chan